

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

-01 Roberto SOLIS (yob 1998) USC
-02 Jose Alfredo GARZA (yob 1996) USC

Case No. M-19-1848-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 5, 2019 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 841, 846

Offense Description

Possession with intent to distribute and
Conspiracy with the intent to distribute 157 kilograms of marijuana, a
schedule I controlled substance.

This criminal complaint is based on these facts:

See attachment 1

☒ Continued on the attached sheet.



Complainant's signature

Tyler Klassen, DEA SA

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/06/2019 - 5:47 PM



Judge's signature

City and state: McAllen, Texas

Juan F. Alanis, U.S. Magistrate

Printed name and title

ATTACHMENT 1

1. On August 05, 2019, U.S. Border Patrol Agents (BPA) and Texas DPS Troopers established surveillance in the area of La Rosita, Texas.
2. At approximately 4:00 p.m., agents observed three subjects with several large bundles, consistent with bundles of marijuana, cross the Rio Grande River in a raft in the area of La Rosita, Texas. Agents subsequently observed the raft land on the riverbank on the U.S. side of the border in the immediate area of a black Chevrolet Cruze, a gold Kia Sorrento, and a gold pickup truck which were parked on the riverbank. The agents then observed the subjects from the raft and additional subjects load the large bundles into the gold Kia Sorrento. Afterwards, the black Chevrolet Cruze and gold Kia Sorrento departed the river bank in tandem and drove north from the border. Agents then observed the black Chevrolet Cruze turn west onto Expressway 83 and the gold Kia Sorrento turn east onto Expressway 83. DPS then conducted a traffic stop on the black Chevrolet Cruze. The driver of the black Chevrolet Cruze was identified as Roberto SOLIS (hereafter, SOLIS) who was subsequently arrested for his involvement in the smuggling attempt. A short time later, DPS attempted to conduct a traffic stop on the gold Kia Sorrento but the driver failed to yield. The Kia Sorrento subsequently traveled back to the Rio Grande River where the driver absconded into Mexico. Agents then secured the abandoned gold Kia Sorrento and observed six (6) large bundles of suspected marijuana inside the vehicle. Shortly after, agents approached the riverbank area where the bundles were loaded into the Kia Sorrento and detained Jose Alfredo GARZA (hereafter, GARZA) and one (1) juvenile subject who were present during the smuggling attempt.
3. On this same date agents processed the six (6) bundles and determined that the bundles weighed approximately 157 kilograms and contained suspected marijuana. A sample from one of the bundles field tested positive for the characteristics and properties of marijuana.
4. On this same date, agents conducted post arrest Mirandized interviews of SOLIS and GARZA. Both GARZA and SOLIS admitted to participating in the smuggling attempt, being hired to help load the illegal narcotics into the Kia Sorrento, and scouting for law enforcement in the area. Both subjects stated that they knew the bundles contained marijuana and were going to be paid for participating in the marijuana smuggling attempt.